



**STEIN | SAKS, PLLC**

YAAKOV SAKS▲\*

JUDAH STEIN▲

ELIYAHU BABAD▲

MARK ROZENBERG

TAMIR SALAND

HASAN SIDDIQUI▲

KENNETH WILLARD▲

PETERPAUL SHAKER

RAMI SALIM▲

▲ NJ Bar Admissions

▪ NY Bar Admission

\*Federal Court Bar Admissions

AR, CT, CO, DC, IL, MI, MO, ND, NE, NM, TN, TX, WI

One University Plaza, Suite 620, Hackensack, NJ 07601 | tel: 201.282.6500 | fax: 201.282.6501 | www.steinsakslegal.com

February 21, 2024

**Via CM/ECF**

The Honorable Brian M. Cogan  
United States District Court  
Eastern District of New York

**Re: Colak v. S & G Hotel Corp.  
Case #: 1:24-cv-01235-BMC**

Dear Judge Cogan:

We represent the Plaintiff in the above-captioned matter. In compliance with Your Honor's February 20, 2024, Order to Show Cause, the Plaintiff respectfully submits this letter.

Counsel for the Plaintiff sincerely apologizes for this clerical error. Plaintiff believes that sanctions should not be imposed for making false certifications on the Civil Cover Sheet filed to commence this action because those certifications were made due to clerical error. The cover sheet at the top states that Plaintiff resides in Nassau County, but incorrectly did not check off the box that the events giving rise to the claim occurred in Nassau or Suffolk County.

Plaintiff's Counsel inadvertently checked "No" on page 2 of the Civil Cover Sheet under NY-E Division of Business Rule 1(c) 2.) a), when he meant to check "Yes." Thus, the Civil Cover Sheet was not completed properly due to Plaintiff's Counsel's mistake. Plaintiff's Counsel failed to meet his obligations due to a clerical oversight and a failure to properly double-check his work. Plaintiff has now filed an Amended Civil Cover Sheet. Plaintiff's Counsel requests that Your Honor show leniency towards Plaintiff's Counsel's oversight.

For these reasons, Plaintiff asks that sanctions not be imposed for making false certifications on the Civil Cover Sheet filed to commence this action because those certifications were made due to clerical error and Plaintiff's Counsel's oversight. We thank Your Honor and the Court for its kind considerations and courtesies and will do our best to make sure nothing of this sort occurs again.



STEIN | SAKS, PLLC

YAAKOV SAKS▲.\*

JUDAH STEIN▲.

ELIYAHU BABAD▲.

MARK ROZENBERG.

TAMIR SALAND.

HASAN SIDDIQUI▲

KENNETH WILLARD▲.

PETERPAUL SHAKER.

RAMI SALIM▲.

▲ NJBar Admissions

▪ NY Bar Admission

\*Federal Court Bar Admissions

AR, CT, CO, DC, IL, MI, MO, ND, NE, NM, TN, TX, WI

One University Plaza, Suite 620, Hackensack, NJ 07601 | tel: 201.282.6500 | fax: 201.282.6501 | [www.steinsakslegal.com](http://www.steinsakslegal.com)

Respectfully submitted,

s/ PeterPaul Shaker

PeterPaul Shaker, Esq.